



April 22, 2019

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Rules and Regulation Implementing the Truth in Caller ID Act of 2009*,
WC Docket No. 11-39; *Call Authentication Trust Anchor*, WC Docket No.
17-97, *Implementing Section 503 of RAY BAUM'S Act*, WC Docket No.
18-335

Dear Ms. Dortch:

Twilio Inc.¹ and the developers that use Twilio's Application Programming Interfaces ("APIs") to add capabilities like voice, video, email, and messaging to their applications are laser-focused on meeting the needs of customers and consumers. On April 15, 2019, Tax Day, Nomorobo²—using Twilio's API—launched a free, real-time feed containing the active phone numbers being used by call back scammers pretending to be the U.S. Internal Revenue Service.³ The feed

¹ Twilio Inc. offers cloud communications services that allow software developers to embed voice, text, chat, email, and video into web and mobile applications. Since its founding in 2008, Twilio has grown to a company of more than 2000 employees, with offices in Europe, Asia, and Latin America, in addition to the United States. Today, Twilio helps more than 140,000 customers, from small businesses to the world's largest multinational companies, in industries including financial services, manufacturing, retail, and many more reinvent how they engage with their customers.

² Nomorobo is a service that prevents unwanted robocalls from reaching participating American consumers while ensuring legal robocalls, like school closings and prescription reminders are allowed through. Since its founding in 2013, Nomorobo has stopped more than one billion unwanted calls for more than 2.5 million users. Nomorobo offers consumers free coverage for VoIP landlines, including integrations with the largest internet service providers, and offers a low cost mobile application for both iOS and Android devices. Nomorobo founder Aaron Foss appears regularly in media and has testified before the U.S. Senate Commerce Committee and U.S. House of Representatives Energy & Commerce Committee on the importance of industry cooperation in preventing unwanted robocalls.

³ New York Times, April 15, 2019, Page A7.

updates every 20 minutes, and is available to any carrier that wants to help stem the tide of IRS robocall scammers.⁴ Twilio and Nomorobo are hopeful that this immediate step will help to enable the telecommunications industry to move closer to ending one of the most dangerous and effective scams perpetrated by bad actors pretending to be the U.S. Internal Revenue Service.

Since winning the FTC Robocall Challenge⁵ in 2013, Nomorobo's service has prevented more than one billion unwanted robocalls from reaching wireline and wireless consumers. Twilio is proud to be part of the technological platform that powers Nomorobo's innovative approach to protecting consumers and echoes the sentiment that American consumers can be protected when "all of us work together."⁶

Like Nomorobo, Twilio is committed to ending unwanted phone calls that are more than just a nuisance, but a threat to all Americans, especially our most vulnerable. In support of that goal, Twilio is committed to working closely with Congress and the Commission to advance a call authentication framework that will empower carriers and consumers to more effectively prevent robocalls.⁷ And, as highlighted in Twilio's recent comments to the Commission on the implementation of RAY BAUM's Act, Twilio supports the great strides the Commission is making to combat robocalls by targeting the fraudulent spoofing of phone numbers.⁸

At the same time, Twilio continues to explore ways to put consumers "back in control" of their phones. In his March 2018 blog, Twilio CEO Jeff Lawson outlined the ways in which Twilio is providing tools for consumers to receive only wanted communications from trusted parties.⁹

⁴ See *Together, We Can Win The War Against Robocalls*, Nomorobo, <https://www.nomorobo.com/irs> (last visited Apr. 17, 2019).

⁵ *FTC Announces Robocall Challenge Winners*, Fed. Trade Comm'n (Apr. 2, 2013), <https://www.ftc.gov/news-events/press-releases/2013/04/ftc-announces-robocall-challenge-winners>.

⁶ Aaron Foss, *Nomorobo Helps Stop Fake IRS Calls*, Twilio Blog (Apr. 15, 2019), <https://www.twilio.com/blog/nomorobo-helps-stop-fake-irs-calls>.

⁷ TRACED Act, S. 151, 116th Cong. (2019); *Chairman Pai Calls on Industry to Adopt Anti-Spoofing Protocols to Help Consumers Combat Scam Robocalls*, FCC News (Nov. 5, 2018), <https://docs.fcc.gov/public/attachments/DOC-354933A1.pdf>; *Comm'r Jessica Rosenworcel Calls on Industry to Provide Consumers with Free Robocall Blocking Tools*, FCC News (Dec. 12, 2018), <https://docs.fcc.gov/public/attachments/DOC-355525A1.pdf>.

⁸ Comments of Twilio Inc., WC Docket Nos. 18-335 & 11-39 (filed Apr. 3, 2019).

⁹ Jeff Lawson, *Your Phone, Your Call—Part I—Eliminating Robocalls*, Twilio Blog (Mar. 3, 2019), <https://www.twilio.com/blog/your-phone-your-call-eliminating-robocalls>.

In short, American consumers will benefit most from full industry collaboration on solutions targeting at eliminating illegitimate robocalls. Developments from companies like Nomorobo and Twilio are having a profound and quantifiable impact on protecting American consumers from the scourge of unwanted robocalls. We are proud to be a part of these efforts and look forward to continuing our work with Congress, the Commission, law enforcement, consumer advocacy groups, and other industry providers on this critical effort.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron Foss', positioned above a horizontal line.

Aaron Foss

Founder, Nomorobo

A handwritten signature in black ink, appearing to read 'Rebecca Murphy Thompson', positioned above a horizontal line.

Rebecca Murphy Thompson

Head, Communications Policy
Global Public Policy & Government Affairs
Twilio